

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

UNIFICATION TECHNOLOGIES LLC,

Plaintiff,

v.

HP INC.,

Defendant.

Case No. 6:20-CV-501-ADA

JOINT MOTION TO DISMISS

Plaintiff Unification Technologies LLC (“Plaintiff”) and Defendant HP Inc. (“Defendant”) hereby move, pursuant to settlement agreement, for an order dismissing the claims and counterclaims in this case. To this end, Plaintiff and Defendant seek dismissal of the claims and counterclaims in this case WITH PREJUDICE, except inasmuch as the claims and counterclaims in this case involve, implicate, or are directed to solid-state drives and/or solid-state drive controllers made and/or sold by or on behalf of Intel Corporation, Kingston Technology Corporation, Micron Technology, Inc., Micron Semiconductor Products, Inc., Micron Technology Texas LLC, Phison Electronics Corporation, Silicon Motion Technology Corporation, and/or any of their respective affiliates, those claims and counterclaims (including all counterclaims relating to invalidity) should be dismissed WITHOUT PREJUDICE.

Plaintiff and Defendant ask, accordingly, that the Court enter the attendant Order of Dismissal, with each party to bear its own costs, expenses, and attorneys’ fees.

Dated: April 27, 2021

<p>Respectfully submitted,</p> <p><u>/s/ Edward R. Nelson III</u> Edward R. Nelson III State Bar No. 00797142 Robert A. Delafield II State Bar No. 24065137 Nelson Bumgardner Albritton PC 3131 West 7th Street, Suite 300 Fort Worth, Texas 76107 817.377.9111 (telephone) ed@nbafirm.com bobby@nbafirm.com</p> <p>Timothy E. Grochocinski (Pro Hac Vice) Illinois State Bar No. 6295055 Nelson Bumgardner Albritton PC 15020 S. Ravinia Ave., Suite 29 Orland Park, Illinois 60462 708.675.1975 (telephone) 708.675.1786 (facsimile) tim@nbafirm.com</p> <p>COUNSEL FOR PLAINTIFF UNIFICATION TECHNOLOGIES LLC</p>	<p>Respectfully submitted,</p> <p><u>/s/ Michael R. Rueckheim</u> Barry K. Shelton Texas State Bar No. 24055029 SHELTON COBURN LLP 311 RR 620, Suite 205 Austin, TX 78734-4775 bshelton@sheltoncoburn.com (512) 263-2165 (Telephone) (512) 263-2166 (Facsimile)</p> <p>Katherine Vidal (pro hac vice) State Bar No. 194971 KVidal@winston.com Michael R. Rueckheim State Bar No. 24081129 MRueckheim@winston.com WINSTON & STRAWN LLP 275 Middlefield Road, Suite 205 Menlo Park, CA 94025 Telephone: (650) 858-6500 Facsimile: (650) 858-6559</p> <p>Vivek V. Krishnan (pro hac vice) VKrishnan@winston.com WINSTON & STRAWN LLP 35 W. Wacker Drive Chicago, IL 60601 Telephone: (312) 558-5600 Facsimile: (312) 558-5700</p> <p>COUNSEL FOR DEFENDANT HP INC.</p>
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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5(b)(1), I hereby certify that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF filing system, which will generate and send an e-mail notification of said filing to all counsel of record, on this the 27th day of April, 2021.

/s/ Edward R. Nelson III